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THE CITY OF NEW YORK  
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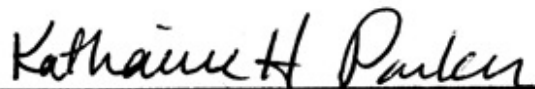
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January 27, 2020

**BY ECF**

Honorable Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**APPLICATION GRANTED**

  
**Hon. Katharine H. Parker, U.S.M.J.**  
**01/28/2020**

Re: Ian-Carlos Martinez v. City of New York, et al.,  
19 CV 9885 (AJN) (KHP)

Your Honor:

I am the Senior Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to the defense of the above-referenced matter.<sup>1</sup> Defendant the City of New York writes to respectfully request a thirty (30) day enlargement of time, until February 26, 2020, to comply with the Court's Valentin Order.

By way of background, plaintiff Ian-Carlos Martinez, proceeding pro se, brings an unreasonable search and seizure claim pursuant to 42 U.S.C. §1983, and a state law false imprisonment claim, against New York Police Department Officer Dawil Valdez and one "John Doe" officer. Plaintiff also appears to attempt to assert a claim of municipal liability against the City of New York. Plaintiff alleges that, while waiting to speak to a potential client, he was unreasonably questioned and searched in a stairwell by Officer Valdez and the "John Doe" officer, who accused him of being at the premises to buy drugs. According to plaintiff, he was thereafter falsely arrested.

On November 26, 2019, the Court ordered this Office to identify the John Doe defendant officer. See Civil Docket Sheet Entry No. 6. To date, despite diligent investigation, defendant City has been unable to ascertain the full name and/or shield number of the John Doe officer purportedly named in plaintiff's Complaint. Plaintiff's Complaint provides no identifying details about the John Doe officer except that he appeared older than defendant Valdez. As such, defendant City respectfully requests an enlargement of thirty (30) days, until February 26, 2020, to respond to the Court's November 26, 2019 Valentin Order. This requested enlargement will afford the City sufficient time to obtain additional documents that may identify the John Doe,

<sup>1</sup> Please take further notice that this case is assigned to Assistant Corporation Counsel Jessica C. Engle, who is presently awaiting admission to the New York State Bar and is handling this matter under my supervision. Ms. Engle may be reached directly at (212) 356-0827, or [jengle@law.nyc.gov](mailto:jengle@law.nyc.gov).

and to speak to individuals who may be able to identify said John Doe, without affecting other deadlines in this case.

Thank you for your consideration of this request.

Respectfully submitted,

Carolyn K. Depoian /S/  
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Senior Counsel

cc: **BY FIRST-CLASS MAIL**  
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